



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #4  
Progress  
Pilsen Soil Operable Unit 2 Residential  
C5N8RV02  
Chicago, IL

**To:** Bruce Everetts, Illinois EPA  
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**From:** Ramon Mendoza, On-Scene Coordinator

**Date:** 5/22/2017

**Reporting Period:** 5/08 to 5/19/2017

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5N8RV02	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	8/3/2015
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	2
<b>Mobilization Date:</b>	12/19/2016	<b>Start Date:</b>	12/20/2016
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	ILN000504472	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

This time critical removal action is a PRP lead under an EPA Unilateral Administrative Order.

#### 1.1.2 Site Description

Pilsen Soil [Operable Unit 2 \(OU2\)](#) Residential Site : Operable Unit (OU) 2 is a residential area bounded by West 18th Place to the north, a north-south alley between South Allport Street and South Racine Avenue to the east, West 21st Street to the south, and South Loomis Street to the west. There are about 178 residential properties in this 25-acre OU2 site. About 116 of the properties have non-permanent covers in their yards such as bare soil, grass or gravel and are the focus of EPA actions. In 2010, approximately 1,563 people lived within the boundaries of the Site, and the residential yards have high accessibility to sensitive populations including young children and pregnant women.

##### 1.1.2.1 Location

Chicago, Illinois 60608  
See Site Description

##### 1.1.2.2 Description of Threat

The lead concentration in surface soils are above the EPA screening level of 400 mg/kg lead in residential yards and gardens. Residents living in these homes may be exposed to the lead in these surface soils.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA conducted Site Assessment activities in 2013 to 2015 with additional residential parcels in 2016 sampled. Lead was found in surface soils in the residential yards and gardens above the EPA removal management level of 400 parts per million. The average Site surface soil lead concentrations were 1,412 mg/kg. There is an estimated population of around 1,563 people including children living, walking, working, and playing on the contaminated surface soils in the Site. These people have a high accessibility to residential yards including sensitive populations such as young children and pregnant women. EPA's risk assessment concluded that

the soil concentrations of lead at the Site are at an unacceptable risk level to the residents accessing the Site.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

Initial residential soil cleanup work was conducted from, 12/20 - 23, 2016. After taking a break from the winter season, residential yard cleanup was restarted on April 24, 2017.

EPA OSC START provided oversight of all removal activities on site. GHD (H.Kramer's contractor) had representatives on-site to oversee the removal work. Removal work was also conducted by GHD's contractor RW Collins. START and EPA OSC, documented property specific removal activities by recording field notes and by taking photographs. Air monitoring as required by OSHA was conducted by GHD.

#### 2.1.2 Response Actions to Date

a) Work conducted from April 24-28, 2017 is documented in POLREP #2; Work from May 1-5, 2017 is documented in POLREP #3.

#### b) The following work was conducted from 5/08 - 19/2017

Work was conducted after H. Kramer's contractor contacted the owners and agreed on a scope of work. Below is a removal status summary of each of the properties: All properties are 4 to 5 ft. below the street level with limited access, which made excavation work more difficult and time consuming. GHD conducted particulate air monitoring during excavation activities. In general, soil was excavated by hand, placed into buckets, and lifted to street level and placed by hand onto the flatbed truck. After it was filled the truck was driven to the H. Kramer truck yard and the soil was transferred to steel containers. Which was then transferred to a solid waste landfill (Laraway) in Joliet IL. Air monitoring for particulates were nondetect to .001 mg/m<sup>3</sup> (average, below action level). Workers wore level D with rubber booties and gloves. GHD provided a boot wash to protect workers and minimize soil migration outside of the work area. Removal work was conducted at two homes during the reporting period. All owners were contacted with the general scope of work agreed to before the work was started and were contacted after the work the completed to make sure they approved of the work (NOTE: Specific Addresses have been changed to protect owner provided as required under federal law).

##### **Non-Responsive** 5/08 to 5/09/2017

Cleanup at this residence will consist of hand excavation of the garden areas in the front yard (area of about 160 ft<sup>2</sup>) down two feet below ground surface (bgs) by the RW Collins Crew. The RW Collins Crew began hand excavation in the front yard front garden area on the south side of the property on 5/05. The owner later stated that he will no longer be gardening in certain portions of the yard. RW Collins Crew hand excavated to two feet below ground surface where a garden was to remain. RW Collins Crew hand excavated to one foot below ground surface in the rest of the yard. Gravel was placed in areas the owner would no longer be gardening. Removal work was completed at this home as of 5/09.

##### **Non-Responsive** 5/09 to 5/19/2017

Cleanup at this residence consisted of hand excavation conducted by the RW Collins crew. Hand excavation will consist of 1) the garden area in the front yard down two feet; 2) the garden area under the backyard stairs down two feet; 3) the backyard garden area to the east of the retaining wall and to the north of the garage down two feet; 4) and hand excavation down to one foot south of the garage by the RW Collins crew. The RW Collins crew began hand excavation in the front yard front garden area on the east side of the property on 5/09. Hand excavation to two feet below ground surface in the garden in the front yard on the east side of the property was completed on 5/10. Hand excavation in the garden area under the stairs in the backyard was completed on 5/11. RW Collins utilized 3 1x10 foot conveyor belts to help transport excavated soil from the Throop property backyard to the truck bed on 5/11 and 5/12. Hand excavation in garden area to the east of retaining wall in backyard was completed to approximately 18" bgs. Construction debris, large rocks, and other fill like material was observed at 18" bgs. EPA OSC told RW Collins crew to stop digging as no gardener would likely dig past that point. Hand excavation to 2 feet bgs on the north side of the garage and 1 foot on the south side of the garage complete on 5/16. All garden areas were backfilled with a layer of rough clean backfill soil and then a layer of pulverized clean backfill soil. The area to the south side of the garage excavated to 1 foot bgs was backfilled with gravel. Removal work is complete at this home as of 5/19.

##### **Non-Responsive** 5/18 to 5/19/2017

Cleanup at this residence consisted of rototilling, hand excavation, and vac trucking of soil conducted by the RW Collins crew. On 5/18 the RW Collins crew utilized a roto tiller to break up surface soil in the backyard and hand dug soil in the vicinity of the electrical line from the building to garage. Hand excavation in back yard to 1 foot bgs. GHD contracted the services of Midwest Power Vac to provide a vac truck to vacuum as RW Collins excavated soil. RW Collins crew acted as the vac truck labor. Excavation was completed at this property on 5/18. The owner stated they would like to put in pavers, replace electrical line, and potentially do sewer work along concrete walkway so the owner did not want the backfill completed. RW Collins placed demarcation barrier and an approximately 3" layer of gravel in backyard excavation area. Backfill work is ongoing as of 5/22/17. RW Collins will complete backfill once owner gives approval.

##### **Non-Responsive** 5/19/2017

Cleanup at this residence will consist of hand excavation to 2 feet bgs on the southern half of the yard with a garden and to 1 foot bgs on the northern half of the yard. On 5/19 the RW Collins crew began prepping the property for removal work. They cleared debris for disposal and moved items the owner wanted to keep out of the way of the excavation. The RW Collins crew also cleared and grubbed the backyard of vegetation in the excavation area. Removal work at this property is ongoing as of 5/22/17.

c. **Additional home access and soil sampling:** The owner from two residential properties **Non-Responsive** contacted GHD and EPA on site and signed consent for access forms. These homes were not sampled before. START and GHD sampled these two homes on 5/11. To date, homeowners have given access to 65 residential parcels at the Site.

d. **Media Interest:** There was no media visits on site or inquiries to EPA regarding the Site from 5/08 to 5/19/2017.

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

During EPA's Removal Site Evaluation (201314), H. Kramer & Co. was identified as a significant contributor to the lead found in surface soils in the residential parcels at the Site, due to historical fugitive air emissions of dust which contained lead (slag and zinc oxide).

The response work is being overseen by EPA/START contractor and is being conducted by H. Kramer's contractors under a Unilateral Administrative Order issued by the USEPA (Sept. 2016). Previous sampling work was conducted from April to June 2016 by H. Kramer's contractors at the Site under an EPA (CERCLA Administrative Order on Consent; to determine the amount of homes above the lead screening level of 400 mg/kg which needed to be cleaned up.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #/Ticket#</i>	<i>Treatment</i>	<i>Disposal</i>
Soil		10.16 tons	1/851385		Laraway RDF, Waste Management, Joliet, IL. Shipped 12/16
Soil		9.42 tons	2/889972		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/26/2017
Soil		11.98 tons	3/890592		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/27/2017
Soil		12.39 tons	4/891212		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/28/2017
Soil		7.95 tons	5/894904		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/08/2017
Soil		11.98 tons	6/896484		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/10/2017

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

Hand excavation will continue in the backyard garden areas of the home on Throop during the week of 5/22. Excavation will be supported by rototillers and vac trucks.

EPA /START will continue oversight of the cleanup work.

#### 2.2.1.2 Next Steps

As of May 19, 2017, H. Kramer's contractors have cleaned up 4 homes since starting on 5/24/2017 and a total of 8 homes since Dec. 2016. Consent for Access have been provided homeowners to 65 homes.

### 2.2.2 Issues

Currently, excavation work is being conducted by hand using shovels, buckets, and wheelbarrows in small yard areas. GHD rented 3 1X10 foot conveyor belts to assist with excavation of these areas. The conveyor belts were utilized by RW Collins to help transport excavated soil from the Throop property backyard to the truck bed on 5/11 and 5/12/2017. GHD also contracted the services of Midwest Power Vac to vacuum soil that was first broken up by hand and broken up with a roto tiller. GHD conducted air monitoring during the work with the vac truck. We are looking at more efficient methods as work continues. Safety is number one priority to make sure crews and community is safe.

## 2.3 Logistics Section

In addition to the crew and hand tools, work is supported by one skid, one flatbed truck, 10 yard containers, 3 1X10 foot conveyor belts, and one pickup truck.

## 2.4 Finance Section

### 2.4.1 Narrative

START Total budget was at \$50,000. START submitted TDD amendment #2 on May 4, 2017 for \$70,000 to bring the total budget ceiling to \$120,000. Of this amount, \$51,815.71 (as of May 21, 2017) has been spent overseeing the responsible party and collecting/analyzing soil samples under the EPA Administrative Order on Consent. Additional funds were utilized for technical support for the Unilateral Administrative Order for the Site. This additional budget is estimated to fund START's continued oversight work and cleanup support through mid-August 2017.

### Estimated Costs \*

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
TAT/START	\$120,000.00	\$51,815.71	\$68,184.29	56.82%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$120,000.00	\$51,815.71	\$68,184.29	56.82%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any

contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Ramon Mendoza, EPA OSC; Paul Pallardy (EPA START)  
Walt Pochron, Ivan Navarro; GHD (H. Kramer contractor)

### 2.5.2 Liaison Officer

EPA Community Relations: Heriberto Leon

### 2.5.3 Information Officer

EPA PIO: Francisco Arcaute, Rachel Bassler

## 3. Participating Entities

### 3.1 Unified Command

None

### 3.2 Cooperating Agencies

City of Chicago, Alderman Solis Office  
City of Chicago Dept. of Public Health;  
Illinois EPA  
ATSDR

## 4. Personnel On Site

Pilsen OU2 Removal – Personnel Counts Notes: START is EPA's oversight contractor GHD and RW Collins are H. Kramer Contractors.					
Date	EPA	GHD		<sup>RW</sup> Collins	EPA/START
5/8 to 19/ 2017	1 (OSC)	2		5	1

## 5. Definition of Terms

N/A

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

<https://www.epa.gov/il/pilsen-area-soil-site>

### 6.2 Reporting Schedule

POLREPS will be issued every two weeks as appropriate.

## 7. Situational Reference Materials

See link for the Site at: <https://www.epa.gov/il/pilsen-area-soil-site>